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and Third-Party Defendant Robert Walsh

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

WALSH SECURITIES, INC., : Civil Action No. 97-cv-3496 (DRD)

Plaintiff, : Hon. Dickinson R. Debevoise

vs. :

CRISTO PROPERTY MANAGEMENT, :
LTD., a/k/a G.J.L. LIMITED, DEK HOMES :
OF NEW JERSEY, INC., OAKWOOD :
PROPERTIES, INC., NATIONAL HOME :
FUNDING, INC., CAPITAL ASSETS :
PROPERTY MANAGEMENT & :
INVESTMENT CO., INC., CAPITAL :
ASSETS PROPERTY MANAGEMENT, :
L.L.C., WILLIAM KANE, GARY GRIESER, :
ROBERT SKOWRENSKI, II, RICHARD :
CALANNI, RICHARD DiBENEDETTO, :
JAMES R. BROWN, THOMAS BRODO, :
ROLAND PIERSON, STANLEY YACKER, :
ESQ., MICHAEL ALFIERI, ESQ., RICHARD :
PEPSNY, ESQ., ANTHONY M. CICALEASE, :
ESQ., LAWRENCE CUZZI, ANTHONY :
D'APOLITO, DAP CONSULTING, :
INC., COMMONWEALTH LAND TITLE :
INSURANCE CO., NATIONS TITLE :
INSURANCE OF NEW YORK, INC., :
FIDELITY NATIONAL TITLE INSURANCE :
CO. OF NEW YORK, COASTAL TITLE :
AGENCY, STEWART TITLE GUARANTY :
COMPANY, IRENE DIFEO, DONNA PEPSNY, :
WEICHERT REALTORS, AND VECCHIO :
REALTY, INC. D/B/A MURPHY REALTY :
BETTER HOMES and GARDENS, :

Defendants, :

**NOTICE OF MOTION TO DISMISS
THIRD-PARTY COMPLAINTS
AGAINST ROBERT WALSH**

and	:
	:
COMMONWEALTH LAND TITLE	:
INSURANCE COMPANY, FIDELITY	:
NATIONAL TITLE INSURANCE COMPANY	:
and NATIONS TITLE INSURANCE OF	:
NEW YORK, INC.,	:
	:
Defendants/Third Party Plaintiffs,	:
	:
v.	:
	:
ROBERT WALSH, JAMES WALSH and	:
ELIZABETH ANN DEMOLA,	:
	:
Third Party Defendants.	:

PLEASE TAKE NOTICE that Third-Party Defendant Robert Walsh hereby moves the Court for an Order dismissing the Third-Party Complaint filed by Defendant/Third-Party Plaintiff Commonwealth Land Title Insurance Company, and the Third-Party Complaint filed by Defendants/Third-Party Plaintiffs Fidelity National Title Insurance Company and Nations Title Insurance of New York, Inc. for failure to state a claim upon which relief may be granted pursuant to Fed. R. Civ. P. 12(b)(6), in the form of the proposed Order filed herewith, which motion is supported by the accompanying Memorandum of Law and which motion is to be heard before the Honorable Dickinson R. Debevoise, United States District Judge, District of New Jersey, Martin Luther King Jr. Federal Building and U.S. Courthouse, 50 Walnut Street, Newark, New Jersey, on the 21st day of September 2009, at 10:00 a.m.

PLEASE TAKE FURTHER NOTICE that the undersigned requests oral argument if timely opposition is filed.

By: _____
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Dated: August 20, 2008